

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

|  |   |                      |
|--|---|----------------------|
| In the Matter of                                   | ) |                      |
|  | ) |                      |
| Amendment of Part 101 of the                       | ) |                      |
| Commission's Rules to Facilitate the               | ) | WT Docket No. 10-153 |
| Use of Microwave for Wireless                      | ) |                      |
| Backhaul and Other Uses and to                     | ) |                      |
| Provide Additional Flexibility to                  | ) |                      |
| Broadcast Auxiliary Service and                    | ) |                      |
| Operational Fixed Microwave Licensees              | ) | WT Docket No. 09-106 |
|  | ) |                      |
| Request for Interpretation of Section              | ) |                      |
| 101.141(a)(3) of the Commission's                  | ) |                      |
| Rules Filed by Alcatel-Lucent, Inc., <i>et al.</i> | ) |                      |
|  | ) |                      |
| Petition for Declaratory Ruling Filed              | ) |                      |
| By Wireless Strategies, Inc.                       | ) | WT Docket No. 07-121 |
|  | ) |                      |
| Request for Temporary Waiver of                    | ) |                      |
| Section 101.141(a)(3) of the                       | ) |                      |
| Commission's Rules Filed by Fixed                  | ) |                      |
| Wireless Communications Coalition                  | ) |                      |

**REPLY COMMENTS OF THE  
COUNTY of SACRAMENTO, CALIFORNIA**

The County of Sacramento, CA hereby replies to the comments submitted in the above-captioned proceeding addressing the proposal<sup>1</sup> to allow the use of auxiliary microwave stations in the point-to-point microwave services.

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<sup>1</sup> See Amendment of Part 101 of the Commission's Rules to Facilitate the Use of Microwave for Wireless Backhaul and Other Uses and to Provide Additional Flexibility to Broadcast Auxiliary Service and Operational Fixed Microwave Licenses; Request for Interpretation of Section 101.141(a)(3) of the Commission's Rules Filed by Alcatel-Lucent, Inc., *et al.*; Petition for Declaratory Ruling Filed by Wireless Strategies, Inc.; Request for Temporary Waiver of Section 101.141(a)(3) of the Commission's Rules Filed by Fixed Wireless Communications Coalition, Notice of Proposed Rulemaking and Notice of Inquiry, WT Docket Nos. 10-153, 09-106 and 07-121 (rel. Aug. 5, 2010) ("NPRM/NOI").

The County of San Mateo<sup>2</sup> has objected to this proposal because it will greatly increase the risk of interference to Critical Public Safety Microwave systems protecting the public in that County. Pursuant to the proposal under this Docket, a Prior Coordination Notification ("PCN") has been filed for a system that would adversely and severely impact San Mateo County's microwave system. More than twenty other parties have agreed that this proposal is not in the public interest, with many detailing the harm that would be caused should the FCC adopt the proposal. We support these objections, and especially the comments filed by the County of San Mateo.

### **DISCUSSION**

The County of Sacramento, CA agrees with a majority of the commenter's who state that the proposal is based "on a flawed premise,"<sup>3</sup>. As stated by EIBASS, " WSI's proposal is "fundamentally flawed and non-credible . . . one that the Commission should finally dispense with, once and for all."<sup>4</sup> The comments also address how adoption of the proposal would destroy the operating environment in the licensed microwave bands. The belief that direct harmful interference can be magically eliminated with an unproven antenna scheme is ridiculous, and is not supported by any credible evidence in the proposals in this Docket. We do not want to jeopardize Public Safety and the safety and lives of our First Responders to add an unproven mystical technology in a congested point-to-point microwave environment that relies on the existing Rules and frequency coordination techniques to assure that systems that serve the needs of our citizens can be implemented without significant risk of interference or system outages caused by unwanted interactions among systems operating in the microwave bands. .

### **CONCLUSION**

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<sup>2</sup> Comments of San Mateo County at 3.

<sup>3</sup> Comments of Comsearch at 4.

<sup>4</sup> Comments of EIBASS at 8.

The County of Sacramento, CA requests that the Commission reject the WSI proposal as EIBASS recommends, to protect this vital Public Safety resource.

Respectfully submitted,

The County of Sacramento

By: 

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